

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

UNITED STATES OF AMERICA,	)	CASE NO. 1:20CR392
	)	
Plaintiff,	)	JUDGE SOLOMON OLIVER, JR.
	)	
vs.	)	
	)	<b><u>UNOPPOSED JOINT MOTION TO</u></b>
CHARLES VACCARO,	)	<b><u>CONTINUE HEARING ON MOTIONS</u></b>
	)	<b><u>TO WITHDRAW AS COUNSEL</u></b>
Defendant.	)	

Now comes undersigned counsel, Paul M. Flannery, Christos N. Georgalis, and Alex B. Spiro, and respectfully requests a ten (10) day continuance on tomorrow's hearing regarding counsel's motions to withdraw for the reasons outlined herein.

On December 14, 2020 and December 15, 2020, undersigned counsel filed their motions to withdraw as counsel for Defendant Charles Vaccaro. The Court scheduled a hearing on counsels' motions to occur on January 28, 2020.

Mr. Vaccaro has since made significant progress in securing new counsel. Undersigned counsel has been in communication with Mr. Vaccaro's new counsel, who is diligently working to finalize the terms of their engagement (and that of new local counsel) and their entry into this case. Once these issues are resolved, which new counsel anticipates within the next ten days, Mr. Vaccaro's new counsel will be moving promptly to substitute their appearance in this matter for current counsel, thereby mooting any issues regarding undersigned counsel's pending motion to withdraw.

Therefore, in the interest of judicial economy, and to preserve defense resources, undersigned counsel respectfully requests that tomorrow's hearing be postponed for ten (10) days

in anticipation that Mr. Vaccaro's new counsel's entry into the matter will render the upcoming hearing moot.

Neither party will be prejudiced by this delay as no trial date has been set and discovery is still ongoing. Undersigned counsel has communicated with Assistant U.S. Attorney Brad Beeson, counsel for the Government, and the United States does not oppose this motion.

Respectfully submitted,

/s/ Paul M. Flannery

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**CERTIFICATE OF SERVICE**

I hereby certify that on January 27, 2021, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. A copy of this motion was sent to Mr. Vaccaro via electronic mail. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's system.

/s/ Paul M. Flannery

Paul M. Flannery

*Attorney for Defendant Charles Vaccaro*